

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

**UNOPPOSED MOTION TO RESET STATUS AND SCHEDULING CONFERENCE
TO THE WEEK OF NOVEMBER 4, 2024**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

The Court recently granted Defendant Google LLC's Application for Status and Scheduling Conference ("Application"), setting the conference for October 30, 2024 at 1:00 p.m.

Lead trial counsel for Google, Ms. Kathy Patrick, is a member of the Board of Directors of the International Academy of Trial Lawyers. She is presently out of the country attending an Academy meeting in Japan and Taiwan. She returns to the United States on October 31, 2024.

If it would not inconvenience the Court, Google respectfully requests that the Status Conference be rescheduled. Counsel for Google and counsel for Plaintiffs have conferred about this request, and the parties agree that moving the conference to the early the following week (avoiding November 5, which is Election Day) will work for both sides, if it works for the Court.

Accordingly, Google respectfully requests that the Status and Scheduling Conference be adjourned and reset for the week of November 4, to allow Ms. Patrick to appear and address the issues raised in Google's Application.

Dated: October 22, 2024

Respectfully submitted,

Gibbs & Bruns LLP

/s/ Kathy D. Patrick

Kathy D. Patrick

Texas Bar No. 15581400

kpatrick@gibbsbruns.com

Robin C. Gibbs

Texas Bar No. 07853000

rgibbs@gibbsbruns.com

Charles Rosson

Texas Bar No. 24074985

crosson@gibbsbruns.com

1100 Louisiana, Suite 5300

Houston, Texas 77002

Tel.: 713.650.8805

Fax.: 713.750-0903

Eric Mahr (*pro hac vice*)

Julie S. Elmer (*pro hac vice*)

Freshfields Bruckhaus Deringer LLP

700 13th Street NW, 10th Floor

Washington, D.C. 20005

(202) 777-4545

eric.mahr@freshfields.com

julie.elmer@freshfields.com

Daniel S. Bitton (*pro hac vice*)

Axinn, Veltrop & Harkrider LLP

55 Second Street

San Francisco, CA 94105

(415) 490-1486

dbitton@axinn.com

Bradley Justus (*pro hac vice*)

James K. Hunsberger (*pro hac vice*)

David R. Pearl (*pro hac vice*)

Axinn, Veltrop & Harkrider LLP

1901 L Street NW

Washington, DC 20036

(202) 912-4700

bjustus@axinn.com

jhunsberger@axinn.com

dpearl@axinn.com

ATTORNEYS FOR

DEFENDANT GOOGLE LLC

CERTIFICATE OF SERVICE

I certify that on October 22, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and thus served on all counsel who have consented to electronic service.

/s/ Kathy Patrick

Kathy Patrick

CERTIFICATE OF CONFERENCE

I certify that I conferred by telephone with Zeke DeRose III, counsel for Plaintiffs, on October 22, 2024 at 8:57 a.m. Japan time / October 21, 2024 6:57 p.m. Houston time regarding this request to reschedule the Status and Scheduling Conference. Mr. DeRose advised that he did not expect Plaintiffs would oppose this motion. On October 23, 2024 at 7:20 a.m. Japan time/5:20 p.m. Houston time, Mr. DeRose confirmed that Plaintiffs did not oppose the request to reset the conference. He advised that, if the conference was reset, Plaintiffs preferred a date early in the week of November 4, avoiding Election Day. That was acceptable to Google. Accordingly, this motion is not opposed.

/s/ Kathy Patrick

Kathy Patrick